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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: December 7

SUBJECT: Montrose Chemical in Los Angeles

SFUND RECORDS CTR
0639-91374

FROM: Eric
Alexis

AR0120

TO: Keith

What have we been doing at this site for the past 10 months?

Background
EPA, with assistance from Metcalf & Eddy, developed an RI/FS workplan for the site, reviewed draft and final copies with state and local agencies, and the company. We met with Montrose to request they conduct the RI per our workplan; last week they responded with a woefully inadequate workplan of their own.

Workplan inadequacies:

1. assumes capping, and EPA's approval thereof
2. grossly inconsistent technical approach, in comparison to EPA workplan.
3. no Phase I on-site soil sampling; relies on historic data (not usable).
4. no commitment to off-site soil sampling program.
5. no air monitoring.
6. no specific sampling plans-grossly overdue.
7. health & safety plan grossly inadequate.
8. insufficient detail throughout; would need much modification, review, delay.
9. no title search, no community relations components to their workplan.
10. no justification for the reduced list of chemicals to be analyzed for.
- 11.

IRM-Capping proposal:

1. presumes EPA approval
2. different intent-assumes final solution
3. requires moving much soil, especially most contaminated portions of site
4. inadequate detail: overall, air portion, health & safety portion
5. likely increases DDT exposure through earth moving
6. stormwater runoff not covered
7. inappropriate air monitoring standard (100 v 10 ppm)

Options:

1. Via letter, inform them of deficiencies and request conducting RI per EPA workplan. Call first to do so, and gauge their response.
2. Issue 106 or 7003 order, requiring performance of EPA workplan.
3. Accept-their proposal as is.
4. Hybrid: let them do wells, we do soils et al.

Recommendation: